

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

BRENNAN M. GILMORE,	:	
Plaintiff,	:	Case No. 3:18-cv-00017
	:	
v.	:	
	:	
ALEXANDER E. JONES, et al.,	:	
Defendants	:	
	:	
	:	
<i>In re subpoena to Verizon for the mobile</i>	:	
<i>phone records of journalist Jessica</i>	:	
<i>Bidgood</i>	:	

**DECLARATION OF CHARLES D. TOBIN**

Charles D. Tobin, pursuant to 28 U.S.C. § 1746, declares as follows:

I am a partner in the law firm of Ballard Spahr LLP and counsel for non-party journalist Jessica Bidgood in the above-captioned action. I submit this declaration in support of Bidgood's motion to quash a subpoena Defendant James Hoft served on Verizon for Bidgood's phone records. I have personal knowledge of the facts herein and would be competent to testify to them.

1. Attached hereto as Exhibit A is a true and correct copy of a letter from me to John Burns, counsel for Defendant Hoft, dated July 22, 2021. As of the date of this filing, I have received no response to the letter.

2. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 2, 2021.

/s/ *Charles D. Tobin*  
Charles D. Tobin